Effects of the Macdougall Creek Bridge on Access to the East Side of Babine Lake

Complaint Investigation 000280

FPB/IRC/68

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The Investigation

On December 1, 2000, the Fort St. James district manager approved a forest development plan (FDP) amendment submitted by Canadian Forest Products Ltd. (the licensee). The licensee proposed to build a bridge across Macdougall Creek to link existing roads in the Fort St. James and Morice Forest Districts.

On January 2, 2001, a person who runs a guiding operation at Smithers Landing on Babine Lake complained to the Forest Practices Board, asserting that the district manager's decision to approve the bridge did not adequately address the environmental risks associated with improving public access to the east side of Babine Lake. Specifically, the complainant raises questions about how the district manager considered the concerns of the Ministry of Environment, Lands and Parks (now the Ministry of Water, Land and Air Protection). The complainant would like to see the bridge closed annually from April through November.

The Board investigated whether the approval met the requirements for plans or amendments under section 41(1)(a) of the *Forest Practices Board of British Columbia Act* (the Act). The Board also examined how the district manager exercised discretion for approvals under section 41(1)(b) of the Act.

Background

Between 1989 and 1993, there was a bridge across Macdougall Creek that provided access to forested areas infested with bark beetles. After the bridge was removed in 1993, the public was fording through Macdougall Creek with pick-up trucks and all-terrain vehicles throughout spring, summer and fall.

On September 15, 2000, the licensee proposed an FDP amendment to re-install the bridge on the previous bridge site. The bridge would be approximately 180 kilometres northwest of Fort St. James and would link road networks in the Fort St. James and Morice Forest Districts. The bridge would enable the licensee to haul timber from the Fort St. James District to Houston for processing. The proposed bridge site was approximately 45 kilometres from the licensee's barge site on the east side of Babine Lake, across from Topley Landing. The barge provides some public access to the northeast shore of the lake. Together, the bridge and barge would provide public access from Fort St. James to Houston. However, the operation of the barge is for industrial purposes and the public needs a licensee-issued pass to use it. The amendment notes that, if requested, the licensee would supply law enforcement officials with a list of people who have used the barge. The Macdougall Creek bridge would provide better access to the northeast shore of Babine Lake from Fort St. James. The bridge improves access across Macdougall Creek, eliminating the need for recreation users to ford the stream.

The amendment stated that the bridge would be closed from Labour Day to the end of hunting season. To close the bridge, the licensee proposed removing sections of the decking and removing the approaches. The amendment also stated that the bridge would be reactivated, as

needed, for hauling purposes. During the investigation, the licensee stated that approximately 75 percent of each year's volume would be hauled in winter. The licensee would use the roads in the spring for work crews piling wood in preparation for the summer haul. Summer access would also facilitate road construction and the hauling of the remaining 25 percent of the volume. The Ministry of Forests stated that spring break-up would make the roads unusable for hauling from April until the end of June, approximately.

The amendment was available for public review and comment from September 20, 2000, to November 20, 2000. The licensee also held four public meetings, which the district manager also attended.

On November 17, 2000, the Ministry of Environment, Lands and Parks (MELP) submitted concerns to the licensee. MELP was concerned that the access provided by the bridge would adversely affect fish and wildlife populations such as lake trout and grizzly bear. MELP stated that the Takla-McDougall area contains high-value grizzly bear habitat, and that the bridge would result in a loop road, which would make enforcement of fishing and hunting regulations more difficult for conservation officers. MELP was particularly concerned about spring, summer and fall access into the area and recommended that the bridge only be open in winter, during active log hauling.

On November 24, 2000, the licensee submitted the amendment to the district manager for approval after modifying it in response to comments from the public and government agencies. The amendment now proposed to limit access by using a gate on the bridge. The bridge would be closed to the public from Labour Day to mid-November. The licensee also committed to working with government agencies to develop alternative methods of access control, if the gate was not effective. The licensee noted that it would not plough the road in winter unless the road was needed for log hauling.

On December 1, 2000, the district manager approved the amendment, subject to the licensee gating the bridge from the Labour Day weekend to mid-November and removing access created by the ford. The licensee was told to deactivate the area where the public was driving through the creek to ensure that pick-up trucks and ATV's could no longer cross the stream as an alternative to using the bridge. The district manager provided a detailed rationale explaining the decision.

The bridge location was discussed in both the 1999 Fort St. James Land and Resource Management Plan (LRMP) and the 2000 Northern Long Term Road Corridors Plan. The road corridors plan is a coordinated access management plan (CAMP). Both documents are referred to in the approved amendment. The licensee stated that the plans followed the intent of the LRMP and CAMP. Neither the LRMP nor the CAMP are higher level plans under the *Forest Practices Code of British Columbia Act* and regulations (the Code), but Cabinet did endorse the LRMP as policy. The district manager considers both documents as policy and guidance in approving operational plans.

Relevant Legislation

Forest Practices Code of British Columbia Act
Section 10 - Forest development plans: content
Section 41 - Approval of plans by district manager or designated environment official
Section 105 - Protection of recreation resources on Crown land

Operational Planning Regulation
Section 18 - Map and information requirements for all forest development plans
Section 70 - Identified wildlife and general wildlife measures

Forest Service Road Use Regulation
Section 6 - Traffic control devices

Forest Road Regulation
Section 1 - Definitions

Issues

The investigation examines the following questions:

1) Did the approval of the amendment meet the requirements of section 41(1)(a) of the Act?

2) Was it appropriate for the district manager to be satisfied that the amendment would adequately manage and conserve the forest resources, as required under section 41(1)(b) of the Act?

Discussion

1) Did the approval of the amendment meet the requirements of section 41(1)(a) of the Act?

The district manager approved the amendment under section 41 of the Act. The district manager must approve an amendment if:

(a) the amendment was prepared and submitted in accordance with the Act, the regulations and the standards; and

(b) the district manager is satisfied that the amendment will adequately manage and conserve the forest resources of the area to which it applies.

To determine whether the approval met the requirements of section 41(1)(a) of the Act, the Board investigated whether the amendment met Code requirements for the following: i) roads and bridges; ii) access control; and iii) fish and wildlife.

i) Did the amendment meet the Code content requirements for roads and bridges?

The amendment was limited to re-establishing the bridge, linking two existing road networks. There was no other development, such as roads or cutblocks, proposed in the amendment. The location for construction of the bridge was properly identified. The amendment stated that the existing road would allow only seasonal use. The bridge would be gated during hunting season and the road would only be ploughed in winter when needed for log hauling. Lastly, the licensee indicated that the bridge would be closed using a gate. The amendment met the content requirements of the Code dealing with roads and bridges, provided by section 10 and 18 of the *Operational Planning Regulation* (OPR).

ii) Did the amendment meet the Code requirements for access control?

The licensee proposed to close the bridge using a gate during hunting season. The Board considered the licensee's authority to restrict road access.

Under section 10(d)(i) of the Act, an operational plan must be consistent with higher level plans in the area. If a higher level plan specifies objectives that can be achieved using access control, or specifies the direct use of access control, then the amendment must follow that direction. There are no higher level plans in place. The Fort St. James LRMP and CAMP are not higher level plans under the Code. The amendment did not have to be consistent with those plans, but the licensee did take guidance from them.

Section 6 of the *Forest Service Road Use Regulation* empowers a district manager to close or restrict access on forest service roads. The Macdougall Creek bridge links the Leo-Sakeniche Forest Service Road to the Hautete Connector Road to Babine Lake. The Ministry of Forests was not controlling access via the ford, nor had they made any restrictions under section 6 of the *Forest Service Road Use Regulation*.

Additionally, section 105 of the Act enables a district manager to restrict, prohibit or attach a condition to non-recreational use and/or recreational use of Crown land. The district manager may restrict access in order to protect a recreation resource or manage public recreation. If section 105 were used to place a restriction on access, then an FDP amendment would have to be consistent with that requirement. There were no restrictions on recreational use or access in the Macdougall Creek area under section 105 of the Act.

Lastly, section 10 (1)(c)(ii) of the Act requires a licensee to propose measures to protect forest resources. The Forest Appeals Commission noted in 1998 that the section applies only to resources identified in the OPR. However, the Commission was referring to the legal minimum for content in FDPs.

In this case, the licensee proposed closing the bridge during hunting season to mitigate the possible impact on wildlife. The licensee's amendment did not specify that the closure was proposed under any particular section of the Code. There is no specific Code requirement requiring or prohibiting the licensee from proposing to restrict road access in its amendment.

iii) Did the forest development plan comply with the Code content requirements for fish and wildlife?

FDPs and amendments must incorporate known information and demonstrate how specified resource values will be protected. Known information is defined as information contained in a higher level plan, or otherwise made known by the district manager or designated environmental official at least four months before the plan or amendment is submitted for approval. The type of information that can be made known is specified in section 18(1)(e) of the OPR. Under section 70 of the OPR, the deputy minister of Water, Land and Air Protection is empowered to identify species at risk; establish wildlife habitat areas; establish management practices in habitat areas; and establish general wildlife measures. Section 18(1)(e)(v) of the OPR requires that known wildlife habitat areas be shown.

No wildlife habitat areas in the Macdougall Creek bridge area have been established and made known. There were no specific Code requirements that applied to the amendment in terms of grizzly bear or lake trout. The amendment met the Code requirements for known information.

In conclusion, the FDP amendment complied with section 41(1)(a) of the Act. The amendment was prepared in accordance with the Act and regulations. It met the Code requirements for roads, bridges, access control, and fish and wildlife.

2) Was it appropriate for the district manager to be satisfied that the FDP amendment would adequately manage and conserve the forest resources?

Section 41(1)(b) of the Act requires that a district manager be satisfied that an amendment will adequately manage and conserve forest resources of the area to which it applies. That determination is discretionary. The standard the Board uses in evaluating discretionary decisions is not whether, in the Board's opinion, the decision was the best decision. Rather, the Board considers whether the decision is consistent with sound forest practices, if it achieved the intent of the Code and if it was based on an adequate assessment of available information.

In this case, the Board examined how the district manager considered whether the amendment adequately addressed access and wildlife issues.

On December 1, 2000, the district manager approved the FDP amendment. The district manager provided a detailed rationale that addressed access control and the risk to wildlife habitat identified by MELP.

In terms of access control, the district manager noted that a bridge closure from Labour Day to mid-November coincides with the hunting season. The district manager noted that access would be available to government enforcement officers. The district manager directed the licensee to monitor and maintain the gate during the fall closure and instructed the licensee to remove the access provided by the ford.

The district manager noted MELP's concerns about the risk to wildlife populations coupled with the difficulty MELP described for enforcement by conservations officers. The district

manager stated that impacts to wildlife populations could be controlled by MELP through regulating hunting and fishing in the applicable wildlife management units. The district manager noted that the decision to approve the bridge was not based on the impacts to wildlife populations that could be addressed through restrictions imposed by MELP. The district manager added that the decision could not be based on MELP not having adequate resources to enforce environmental regulations such as the *Wildlife Act*.

Lastly, the district manager stated that she did consider whether there was significant risk to wildlife habitat and populations. She decided that there was little to no risk to wildlife habitat if the bridge was approved. The district manager stated that a road was already in existence and the amendment did not include any new harvesting. As well, the installation of the bridge would result in the ford being removed. The public would not be able to drive through the creek any more, which would improve fish habitat.

Was the amendment consistent with the Fort St. James Land and Resource Management Plan?

The Fort St. James LRMP provides objectives and strategies for the Takla-Middle Resource Management Zone. The Northern Long Term Road Corridors Plan (September 2000) was the result of a recommendation in the LRMP. The LRMP, crafted with public input, created a public expectation that guidelines within it would be considered in the preparation and approval of a Code operational plan such as an FDP amendment. LRMP guidelines and the CAMP recommendations are important to consider in assessing forest practices. That is, if an operational plan is consistent with the recommendations, then the decision to approve it is likely an appropriate decision.

Access via the Macdougall Creek bridge is discussed in the Takla-Middle Resource Management Zone in the LRMP. The LRMP states that the management intent for this zone is as follows:

> Management on these lands emphasizes the development of resources such as mineral extraction and timber harvesting, while minimizing impacts on other resources through a variety of integrated resource management strategies. Access is relatively unrestricted with the exception of any land that may need special management considerations.

The LRMP objectives and strategies for wildlife habitat and populations do not specifically include public access restrictions. However, the LRMP contains an objective to manage recreational access on the Macdougall Creek Road. The LRMP recommends managing recreational access by implementing three strategies.

First, the LRMP recommends that the bridge should be in place a minimal amount of time. Specifically, the LRMP stated "Minimize the amount of time that the Macdougall Creek Bridge is in place, and remove the bridge at each opportunity when active operations cease."

The LRMP did not define "active operations," nor did it specify any preference for seasonal closures. The term active operations could apply to those activities occurring on just one cutblock, or to all the forestry operations in the licensee's FDP. As well, active operations could include all forest activities such as harvesting, hauling, road construction and silviculture. Therefore, the interpretation of active operations could be limited to a small scope of just one cutblock with activities occurring over a couple of months, or it could include all activities included in an entire five-year FDP occurring over many years.

The term "minimizing" is also difficult to quantify. One interpretation would suggest that the bridge would be closed any time during the year when not needed for active operations. For example, the bridge could be closed between the time timber hauling is complete and the time the bridge would be needed for silviculture activities several months later. In this case, the licensee proposed closing the bridge only during hunting season. It is likely, but not certain, that there would be additional times during the year when the bridge would not be needed and could be closed. Another interpretation is that the bridge should remain in place until all of the forestry activities, over several years, have ceased. In this case, the licensee stated that it would use the road during the spring and summer for silviculture activities, road building, and some log hauling. Given the limited guidance provided by the LRMP goal to minimize the amount of the time the bridge is in place, the amendment fell within the range of possible interpretations.

Second, the LRMP recommends that access management be addressed in the CAMP identifying "long-term road corridors." That was done in September 2000, in the Northern Long Term Road Corridors Plan. The corridors indicate the location of main road systems for new access development. In the Macdougall Creek area, the long-term road corridors are the Leo-Middle Forest Service Road in the south, and the Leo-Sakeniche Forest Service Road in the north. The CAMP notes that physical conditions exist at Macdougall Creek to allow control of access. The CAMP also includes references to a July 8, 1994, decision regarding future re-establishment of the bridge at Macdougall Creek. In 1994, a previous district manager decided that if the bridge were to be re-established in the future, it should be closed between Labour Day and the end of hunting season. The previous district manager stated that the bridge closure would restrict access at a time critical for wildlife management and the operation of the hunting/guiding industry, and permit public access during the peak summer period for recreation. While the CAMP refers to this previous decision, it does not include it as a strategy or direction. The CAMP states that future CAMP phases will define the status of roads, establish deactivation schedules and identify access-control points. The Fort St. James Forest District has now begun the second phase of the CAMP planning process. Therefore, the amendment is consistent with the direction in the CAMP, although government has only begun to address access control in phase II.

Lastly, the LRMP recommends that any applications for permanent access should involve a public process. The amendment proposed this temporary bridge. The *Forest Road Regulation* defines a temporary bridge as having an expected life of 15 years or less.

The licensee made the amendment available for public review and comment as required by the Act. The licensee also held public meetings to discuss the amendment. However, the complainant maintains that the licensee-initiated process is not neutral. He asserts that the public process should have been the responsibility of government.

The LRMP does not provide any guidance on the type of public process to be used. Under the Code process for forest development planning, the public is given the opportunity to discuss the amendment and to provide written comments. The district manager also attended public meetings held by the licensee. The licensee was required by the Code to review the public's comments and, where appropriate, to make changes to the plan.

Guidance in the LRMP is specific to applications for permanent access, not temporary access. While the amendment proposed to build a temporary bridge, hence temporary access, it was consistent with LRMP guidance for permanent access.

The district manager's rationale did not discuss the amendment's consistency with either the LRMP or the CAMP. However, prior to each year's FDP submissions, the district manager provides licensees with a policy for development planning. The policy, dated March 2000, states that although the LRMP has not been declared a higher level plan under the Code, licensees should refer closely to the LRMP information, strategies and objectives. The policy also notes that the licensees should consider the development plan as an opportunity to demonstrate to the district manager and the public their proper stewardship and management of the forest resources. In this case, the FDP amendment appropriately referenced both the LRMP and CAMP.

The Board considers it important for the district manager's rationale to have discussed the LRMP and CAMP specifically. However, the FDP amendment the district manager considered did reference both the LRMP and CAMP, and was consistent with the guidelines and recommendation contained within them.

Issues raised by the Ministry of Environment, Lands and Parks

The district manager was obligated under section 41(1)(b) of the Act to consider the amendment's impact on wildlife. In analyzing whether the district manager adequately considered the impact on wildlife, the Board considered how the amendment and the district manager's approval addressed wildlife concerns raised by MELP. On November 17, 2000, MELP submitted its concerns to the licensee. MELP raised its concerns about increasing the quality, availability and ease of access to the northeast shore of Babine Lake. MELP maintained that increased access would affect fish and wildlife populations.

MELP did not support the amendment, for several reasons. MELP was concerned that the bridge created a loop road and would improve access to the northeast shore of Babine Lake, encourage over-hunting and fishing, damage habitat resources and create enforcement problems. Specifically, MELP stated that allowing the bridge to be open for 10 months would affect grizzly bear and lake trout populations. MELP suggested that the bridge be closed at all

times except during active hauling. MELP stated that by closing the bridge, except during winter, impacts to grizzly bear and lake trout would be manageable.

In considering MELP's concern with access, the district manager noted that the amendment did not propose any new road construction. The roads already existed and the stream was already being crossed without a bridge. The predicted impacts to fish and wildlife populations assumed that the bridge would provide better access to the area. While the bridge would provide better spring and summer access, it restricted access in the fall from what had been previously been provided by the ford. The Board notes that only the condition of the channel banks, streambed, and the water level of the stream limited fording access. The public was crossing the stream in spring, summer and fall. The approval of the amendment would not create new access, but would improve existing access into the area.

MELP wanted the specific method of access control to be clearly defined, effectively monitored and maintained. The licensee stated that it would close the bridge from Labour Day to mid-November using a gate, and monitor its effectiveness. The licensee also committed to working with government agencies to develop alternative methods of access control, should the gate not prove effective. The licensee also noted that it would not plough the road in winter, unless the road was needed for hauling. Furthermore, the district manager directed the licensee to ensure that the gate was effective at restricting access to the area. The Board considers that the content of the amendment, and the conditions contained in the MOF approval to address MELP's concern with the method of access control was appropriate.

MELP's FDP submission stated that:

> BC Environment does not generally support the creation of loop roads due to the negative impact to fish, wildlife and habitat resources, coupled with the difficulty for enforcement by conservation officers. Staffing levels for conservation officers are not expected to improve at any point in the near future.

The district manager had the responsibility to consider wildlife management and access control in the decision. The district manager's rationale stated that the decision to approve the bridge was not based on impacts to wildlife populations that could be controlled through hunting restrictions or adequate enforcement by MELP. In other words, her approval would not replace the obligation of MELP to regulate hunting and fishing in the area. The Board emphasizes that the obligations of one agency or ministry cannot be shifted to another agency. MELP had an obligation to manage wildlife, which it could not transfer to the Ministry of Forests. Even so, the district manager was obligated under section 41(1)(b) of the Act to consider the amendment's impact to wildlife.

In analyzing whether the district manager adequately considered the impact to wildlife, the Board considered information with respect to the two wildlife species of most concern to MELP.

Grizzly Bear

Grizzly bear populations in the Fort St. James District are not considered threatened and therefore do not qualify as identified wildlife, so no wildlife habitat areas with management objectives have been established. The LRMP has a general objective of maintaining or completing grizzly bear habitat mapping. The LRMP stated that habitat mapping would aid in managing industrial and recreational activities in areas important to bears. The LRMP goes on to state that where resource development is near high-value grizzly habitat, the timing of resource development should be considered. As well, the LRMP includes proposals to minimize conflicts between humans and grizzly bears. Timber cruising, mineral exploration and recreation are to be scheduled to avoid concentrated activity in areas of high grizzly bear use. The Takla-Middle Resource Management Zone does not identify any specific areas important to grizzly bear near Macdougall Creek, or apply restrictions on the timing of timber harvesting or hauling in that general vicinity.

On the issue of timing, the Board considered the frequency of road use that might occur in the spring and summer. The Board has learned that grizzly bears can be displaced from areas when nearby roads have significant levels of human activity (i.e. log hauling).[1] The licensee stated it would use the roads in the spring for crews piling wood in preparation for hauling logs out of the area during the summer. The Ministry of Forests stated that spring break-up would make the roads unusable for hauling from April to the end of June. MELP stated that it does not have information on the behaviour of bears in the Macdougall Creek area. However, as a general observation, grizzly bears emerge from hibernation from mid-March to mid-May. Then, they tend to remain in valley bottom areas for another four to six weeks before moving to higher elevations. The Board concludes that it would be unlikely that log hauling would occur in the spring, and considers that use of the road would be limited during this season. The licensee stated that approximately 25 percent of the log hauling would occur in the summer. The objectives for the Takla-Middle Resource Management Zone emphasize resource development and relatively unrestricted access. MELP has not specifically identified any critical areas for grizzly bear, or restrictions on timing of harvest. The Board concludes there was nothing to indicate to the district manager that the use of the bridge during spring and summer would negatively affect grizzly bear populations.

Lake Trout

The LRMP's fish and fish habitat objectives for the Takla-Middle Resource Management Zone did not identify any concerns about lake trout. The LRMP recommends identifying sensitive habitat such as spawning areas, but otherwise provides only general management direction for fish and fish habitat. MELP stated that improved access from the bridge could increase fishing pressures on at least five specific sensitive lakes for this species. However, they acknowledged that there are no specific lake trout regulations in place for this area. The Board concludes that,

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[1] *Recovery Plan for Grizzly bears in the North Cascades of British Columbia* - January 19, 2001 - Consensus Recommendation Draft for Consultation, North Cascades Grizzly Bear Recovery Team.

without any information as to the potential for increased fishing, and no apparent need of any special regulations to protect lake trout, there was a lack of compelling information on which the district manager could base any decision to further restrict access.

The district manager was obligated under section 41(1)(b) of the Act to consider the amendment's impact to wildlife. The district manager did address MELP's concerns with access control and the effect on wildlife. The district manager approved the licensee's proposal to deactivate the ford and close the bridge during hunting season. The district manager also noted that MELP should impose whatever additional restrictions it thought necessary through other legislation. In the Board's opinion, MELP's concerns with increasing the quality, availability and ease of access to the northeast shore of Babine Lake were adequately addressed by both the licensee's amendment and the district manager's approval. In coming to this conclusion, the Board considered the LRMP and CAMP as appropriate sources to consult in the preparation and approval of both FDPs and amendments.

The decision to approve the amendment was based on an adequate assessment of the information contained in the amendment, submissions by MELP and submissions from the public. Key information regarding the method, timing and alternatives for access control were provided to and considered by the district manager. The licensee's final plan and the district manager's decision addressed the wildlife issues raised. The Board concludes that it was appropriate for the district manager to decide that the amendment would adequately manage and conserve the forest resources as required under section 41(1)(b) of the Act.

Conclusions

1) Did the approval meet the requirements of section 41(1)(a) of the Act?

The amendment met the content requirements of the Code dealing with roads and bridges. In terms of access control, the Board noted that there is no specific Code requirement requiring or prohibiting the licensee from proposing to restrict road access in its FDP amendment. Lastly, although the deputy minister of Ministry of Water, Land and Air Protection is empowered to identity species at risk, establish wildlife habitat areas, establish management practices in habitat areas and establish general wildlife measures, no such provisions were established for the Macdougall Creek area. Consequently, there were no specific Code requirements that applied to the amendment in terms of grizzly bear or lake trout. The amendment complied with section 41(1)(a) of the Act. The amendment was prepared in accordance with the Act and regulations. It met the requirements for roads and bridges, access control and fish and wildlife.

2) Was it appropriate for the district manager to be satisfied that the amendment would adequately manage and conserve the forest resources as required under section 41(1)(b) of the Act?

The Board concludes that the amendment was consistent with the policy direction contained within the Fort St. James LRMP and CAMP. The Board considers LRMP guidelines and CAMP recommendations important in assessing proposed forest practices. The Board also concludes that it was appropriate for the district manager to decide that the plan would adequately manage and conserve the forest resources as required under section 41(1)(b) of the Act. The decision to approve the amendment was based on an adequate assessment of the information contained in the amendment, submissions by MELP and submissions from the public. Key information regarding the method, timing and alternatives for access control were provided and considered by the district manager. The licensee's final plan and the district manager's decision addressed the wildlife issues raised by MELP.

Commentary

In considering the approval of the Macdougall Creek bridge, the Board considered the advice contained in the Fort St. James LRMP. The licensee and district manager followed the intent of the LRMP. However, the Board also recognizes that some of the terminology of the LRMP provided for several interpretations.

Strategic land-use plans need to be completed if the Code is to ensure that all forest resources on public lands are adequately managed and protected. Furthermore, it is difficult for a district manager to enforce the conditions or intent of an LRMP if it has not been formally established under the Code. If the Fort St. James LRMP resource management zones and objectives were formally established under the Code and implemented, it would assist in the preparation and approval of subsequent FDPs and amendments. As well, it would provide greater certainty with respect to other forest resources, including grizzly bear.

Lastly, the Board commends the Ministry of Forests, the licensee and the Ministry of Water, Land and Air Protection for progressing with phase II of the Northern Long Term Road Corridors Plan.